

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT OF PUERTO RICO**

In re:

MARIA SOCORRO QUIÑONES JIMENEZ

Debtor

CASE NO. 2011-04189-MCF

CHAPTER 7

STIPULATION TO LIFT STAY

TO THE HONORABLE COURT:

Come now, Debtor, Chapter 7 Trustee and secured creditor Toyota Credit de Puerto Rico Corporation ("Toyota Credit"), through their undersigned attorneys, and very respectfully state and pray:

1. Toyota Credit is a secured creditor of Debtor by virtue of being holder in due course of a duly registered conditional sales contract that encumbers Debtor's 2005 Toyota Echo motor vehicle with vehicle identification number (VIN) JTDAT123950397658. (the "Collateral").

2. Debtor surrendered Toyota Credit's collateral on November 6, 2011.

3. For such reason, the appearing parties agree to file this stipulation in which Debtor and the Chapter 7 Trustee agrees to the lift of the automatic stay, and any proprietary interest in connection therewith.

4. Regarding Toyota Credit's security, the appearing parties agree to the following:

a. Debtor and the Chapter 7 Trustee agree to the lift of the automatic stay over Toyota Credit's Collateral, and any proprietary interest in connection therewith, as part of Debtor's Chapter 7 bankruptcy case.

b. Consequently, Debtor and the Chapter 7 Trustee allow Toyota Credit to sell and/or dispose of the surrendered motor vehicle as it deems necessary in a commercially reasonable manner, and file a proof of claim for the pending deficiency.

c. This Stipulation shall be notified to all parties in interest, who are hereby advised that they have twenty-one (21) days to file their oppositions to the terms of this Stipulation. If no opposition is filed within twenty-one (21) days of the notice of this Stipulation, the Bankruptcy Court may enter an order approving the same.

Such is the Stipulation to Lift Stay agreed by the undersigned parties, whose approval by the Honorable Bankruptcy Court is respectfully requested.

RESPECTFULLY SUBMITTED.

In San Juan, Puerto Rico, on this 18th day of April, 2013.

ROBERTO FIGUEROA CARRASQUILLO
Attorney for Debtor

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Chapter 7 Trustee

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NOTICE

Notice to all parties is hereby given that if no opposition to the terms of this Stipulation is filed within twenty-one (21) days of the notice of this Stipulation, the Bankruptcy Court may enter an order approving the same.

In San Juan, Puerto Rico, on this 18th day of April, 2013.

CERTIFICATE OF MAILING

I HEREBY CERTIFY that on this same date a true and exact copy of this document has been sent by regular mail to all interested parties included in the attached master address list.

In San Juan, Puerto Rico, on this 18th day of April, 2013.

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Label Matrix for local noticing
0104-3
Case 11-04189-MCF7
District of Puerto Rico
Old San Juan
Thu Apr 18 10:31:13 AST 2013

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End of Label Matrix	
Mailable recipients	24
Bypassed recipients	0
Total	24